

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re **Toni R. Vaughn**

Debtor(s)

Case No. **18-13032**

Chapter **13**

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE**

Toni R. Vaughn has filed a Motion to be permitted to Modify her First Amended Plan post-confirmation.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 21, 2018, you or your attorney must do all of the following:

- a. File an answer explaining your position at:

Robert N. C. Nix, Sr. Federal Courthouse  
900 Market Street  
Suite 400  
Philadelphia, PA 19107  
215-408-2800

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b. Mail a copy of the movant's attorney

Erik M. Helbing, Esquire  
1328 Second Avenue  
Berwick, PA 18603  
570-498-5544 (phone)  
570-371-5445 (fax)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Jean FitzSimon, on November 28, 2018, at 9:30 A.M., in Courtroom No. 3 in the Robert N. C. Nix, Jr. Federal Courthouse, 900 Market Street, Philadelphia, Pennsylvania, 19017.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in Paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Respectfully Submitted,

Dated: October 29, 2018

/s/ Erik M. Helbing  
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570-498-5544